

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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HICKEY FREEMAN TAILORED CLOTHING, INC.,

Plaintiff,

-against-

CHARGEURS, S.A., LAINIERE DE PICARDIE BC SAS,  
LAINIERE DE PICARDIE INC., LAINIERE DE  
PICARDIE (WUJIANG) TEXTILES CO. LTD, AND  
VERATEX LINING LTD.,

Defendants.

:  
: Case No.: 17-cv-5754 (KPF)  
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:  
: DECLARATION OF CAROLINE  
: A. MORGAN IN SUPPORT OF  
: CHARGEURS S.A. AND  
: LAINIERE DE PICARDIE  
: INC'S OPPOSITION TO  
: PLAINTIFF'S MOTION TO  
: AMEND AND TO COMPEL  
:  
:  
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I, CAROLINE A. MORGAN, declare as follows under penalty of perjury pursuant to 28  
U.S.C. § 1746:

1. I am an associate with Fox Rothschild LLP, attorneys for defendants Chargeurs  
S.A. and Lainiere de Picardie Inc. ("Defendants") in the above captioned matter. I am fully  
familiar with the facts set forth herein, and respectfully submit this declaration in support of  
Defendants' opposition to Plaintiff's motion to amend and to compel.

2. A true and correct copy of the June 21, 2018 deposition transcript of Jeffrey  
Diduch is attached hereto as Exhibit 1.

3. A true and correct copy of the transcript from an August 31, 2017 hearing before  
this Court is attached hereto as Exhibit 2.

4. A true and correct copy of Hickey Freeman's June 25, 2018 Letter Motion is  
attached hereto as Exhibit 3.

5. A true and correct copy of Hickey Freeman's July 3, 2018 Letter Motion is  
attached hereto as Exhibit 4.

6. A true and correct copy of the June 18, 2018 deposition transcript of Vanessa Defait is attached hereto as Exhibit 5.

7. A true and correct copy of the June 12, 2018 deposition transcript of Francois Rousseau is attached hereto as Exhibit 6.

8. A true and correct copy of search results from the United States Patent and Trademark Office's Trademark Electronic Search System are attached hereto as Exhibit 7.

9. A true and correct copy of the June 19, 2018 deposition transcript of Vanessa Defait is attached hereto as Exhibit 8.

10. A true and correct copy of a June 12, 2018 email from Frank D'Angelo to Caroline Morgan is attached hereto as Exhibit 9.

11. A true and correct copy of Plaintiff's Proposed Amended Complaint is attached hereto as Exhibit 10.

12. A true and correct copy of the transcript from a July 17, 2018 conference before this Court is attached hereto as Exhibit 11.

13. A true and correct copy of Plaintiff's May 14, 2018 Request for Issuance of Summons is attached hereto as Exhibit 12.

14. A true and correct copy of the June 13, 2018 deposition transcript of Francois Rousseau is attached hereto as Exhibit 13.

15. A true and correct copy of the stipulated transcription of Francois Rousseaus' speech is attached hereto as Exhibit 14.

16. A true and correct copy of the August 31, 2017 Scheduling Order is attached hereto as Exhibit 15.

17. A true and correct copy of Defendants' Memorandum of Law in support of their motion for a protective order is attached hereto as Exhibit 16.

18. A true and correct copy of Plaintiff's originally filed complaint is attached hereto as Exhibit 17.

19. A true and correct copy of the Chargeurs organizational chart produced to Hickey Freeman is attached hereto as Exhibit 18, *submitted under seal*.

20. A true and correct copy of Chargeurs' 2016 Registration Document is attached hereto as Exhibit 19.

21. A true and correct copy of Chargeurs' 2016 Annual Report is attached hereto as Exhibit 20.

22. A true and correct copy of a May 1, 2017 letter from Stephen Granovsky to Bernard Vossart is attached hereto as Exhibit 21.

23. A true and correct copy of a May 5, 2017 letter from Hickey Freeman's counsel to Bernard Vossart is attached hereto as Exhibit 22.

24. A true and correct copy of public registry documents from Infogreffe.com and their corresponding certified English translations are attached hereto as Exhibit 23.

25. A true and correct copy of Fitexin and Chargeurs Entoilage D&B Credit Reports are attached hereto as Exhibit 24.

26. A true and correct copy of Fitexin and Chargeurs Entoilage Hoovers Reports are attached hereto as Exhibit 25.

27. A true and correct copy of a snapshot from Loeb and Loeb's website as of September 14, 2018 is attached hereto as Exhibit 26.

28. A true and correct copy of the June 25, 2018 deposition transcript of Alan Abramowicz is attached hereto as Exhibit 27, *submitted under seal*.

29. A true and correct copy of a July 17, 2018 Order from this Court is attached hereto as Exhibit 28.

30. A true and correct copy of a May 01, 2017 email from Patricia Bradley, on behalf of Stephen Granovsky, to Bernard Vossart is attached hereto as Exhibit 29.

31. A true and correct copy of a May 02, 2017 email from Alan Abramowicz to Bernard Vossart is attached hereto as Exhibit 30.

32. A true and correct copy of a May 03, 2017 email from Alan Abramowicz to Bernard Vossart is attached hereto as Exhibit 31.

33. A true and correct copy of Defendants' October 30, 2017 responses to Plaintiff's interrogatories are attached hereto as Exhibit 32, *submitted under seal*.

34. A true and correct copy of the transcript from an April 19, 2018 hearing is attached hereto as Exhibit 33.

35. A true and correct copy of the May 31, 2018 deposition transcript of Gilles Hourlier is attached hereto as Exhibit 34.

36. A true and correct copy of Defendants' June 28, 2018 Letter Motion is attached hereto as Exhibit 35.

37. A true and correct copy of the November 21, 2017 Scheduling Order is attached hereto as Exhibit 36.

38. A true and correct copy of the February 2, 2018 Scheduling Order is attached hereto as Exhibit 37.

39. A true and correct copy of the April 27, 2018 Scheduling Order is attached hereto as Exhibit 38.

40. A true and correct copy of Plaintiff's August 8, 2017 letter to this Court is attached hereto as Exhibit 39.

41. A true and correct copy of the June 7, 2018 deposition transcript of Stephen Granovsky is attached hereto as Exhibit 40, *submitted under seal*.

42. A true and correct copy of the June 27, 2018 deposition transcript of Alexandre Marlien is attached hereto as Exhibit 41.

43. A true and correct copy of LP Wujiang's Articles of Association and its corresponding certified English translation are attached hereto as Exhibit 42, *submitted under seal*.

44. A true and correct copy of an August 15, 2018 email from Frank D'Angelo to Caroline Morgan is attached hereto as Exhibit 43.

Dated: September 14, 2018  
New York, New York

/s/ Caroline Morgan  
Caroline A. Morgan, Esq.